

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

TUSHBABY, INC.,

Plaintiff,

v.

FLEEROSE, a Foreign Corporation,

Defendant.

Consolidated Case No. 1:24-cv-21136-  
LEIBOWITZ/TORRES

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
STIPULATION OF DISMISSAL AS TO DEFENDANT FLEEROSE**

On May 6, 2025, pursuant to Local Rule 16.4, Plaintiff Tushbaby, Inc. (“Tushbaby” or “Plaintiff”) notified this Court that it had reached a settlement in principle with Defendants Shiaon and Fleerose (together with Tushbaby, the “settling parties”) (ECF No. 136). Upon receiving Plaintiff’s Notice of Settlement, this Court directed the settling parties to file a stipulation of dismissal of all claims pursuant to Federal Rule of Civil Procedure 41(a) within sixty (60) days from the Order, dated May 6, 2025 (ECF No. 137).

Plaintiff has finalized its settlement with Defendant Shiaon and filed a stipulation of dismissal to that effect by the Court’s July 7, 2025 deadline (ECF No. 143). While Plaintiff and Defendant Fleerose have diligently sought to consummate their settlement, this has proven to be more complex than initially anticipated, due to the nature of the intellectual property at issue, Fleerose’s business, and the extraterritorial nature by which Fleerose operates.<sup>1</sup> Nonetheless, the terms are close to being finalized, and the parties anticipate executing the settlement very soon.

---

<sup>1</sup> Furthermore, Defendant Fleerose is located in mainland China, which is 12 hours ahead of the parties’ counsel. This major time-difference, coupled with the language barrier, has caused resulted in more drawn-out negotiations.

In light of the foregoing, Plaintiff respectfully requests a two-week extension to finalize the settlement and file the stipulation of dismissal as to Defendant Fleerose.

WHEREFORE, Plaintiff Tushbaby, Inc. respectfully requests that the Court issue the attached Order extending the deadline to file the stipulation of dismissal as to Defendant Fleerose to July 21, 2025.

**Certificate of Good Faith Conference**

The undersigned hereby certifies that counsel for Tushbaby has conferred with counsel for Defendant Fleerose on this motion. Counsel for Fleerose stated “no objection.”

Dated: July 7, 2025

Respectfully submitted,

*/s/ James M. Slater*

---

James M. Slater (FBN 111779)  
ESCA Legal LLC  
9000 Dadeland Blvd. #1500  
Miami, FL 33156  
Tel.: (305) 523-9023  
james@esca.legal

Leo M. Lichtman (admitted *pro hac vice*)  
ESCA Legal LLC  
1117 Sixth Avenue, Fifth Floor  
New York, New York 10036  
Tel.: (347) 745-2535  
leo@esca.legal

*Attorneys for Plaintiff Tushbaby, Inc.*